

Exhibit D

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The Honorable Wm. Fremming Nielsen

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

AUG 05 2002

JAMES R. LARSEN, CLERK
DEPUTY
SPOKANE, WASHINGTON

Attorneys for Defendants Watchtower
and Othello North Spanish Congregation

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON**

ERICA RODRIGUEZ, a single
person,

Plaintiff,

vs.

WATCHTOWER BIBLE and
TRACT SOCIETY OF NEW YORK,
INC., a New York corporation;
OTHELLO SPANISH
CONGREGATION OF
JEHOVAH'S WITNESSES, an
unknown legal entity; and MANUEL
BELIZ, individually and on behalf of
his marital community,

Defendants.

No. CS-02-0190-~~WEN~~ ^{efs}

**DEFENDANTS
WATCHTOWER AND
OTHELLO (NORTH)
SPANISH
CONGREGATION'S
ANSWER TO PLAINTIFF'S
COMPLAINT**

And

**JOINDER IN DEMAND FOR
JURY TRIAL**

DEFENDANTS WATCHTOWER and
OTHELLO'S ANSWER TO PLAINTIFF'S
COMPLAINT - 1

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP
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1 The defendants, WATCHTOWER BIBLE and TRACT SOCIETY OF
2 NEW YORK, INC., (hereinafter "Watchtower") and OTHELLO SPANISH
3 CONGREGATION OF JEHOVAH'S WITNESSES (hereinafter "Othello
4 North Spanish Congregation"), by and through their attorneys, Paine,
5 Hamblen, Coffin, Brooke & Miller LLP, Gregory J. Arpin and Donald G.
6 Stone, for answer to plaintiff's complaint, admit, deny, and allege as follows:
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10 **I.**

11 **JURISDICTION**

12
13 Admit that the amount in controversy exceeds \$75,000 and that
14 diversity of citizenship exists between the plaintiff and the defendants.
15 Further admit that this Court has jurisdiction over the subject matter of the
16 plaintiff's complaint under the authority cited in paragraph I of plaintiff's
17 complaint. Defendants deny any remaining allegations of paragraph I of
18 plaintiff's complaint.
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22 **II.**

23 **PARTIES**

24
25 1. With reference to paragraph 1 of plaintiff's complaint, admit that
26 plaintiff Erica Rodriguez previously resided in the State of Washington; admit
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29 DEFENDANTS WATCHTOWER and
30 OTHELLO'S ANSWER TO PLAINTIFF'S
COMPLAINT - 2

PAINE, HAMBLEN, COFFIN, BROOKE & MILLER LLP
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1 that she currently resides in Sacramento, California; admit that she is presently
2 of the age of majority; and further admit that plaintiff and her parents
3 previously attended services of the Othello North Spanish Congregation of
4 Jehovah's Witnesses in Othello, Washington. Defendants deny any remaining
5 allegations of paragraph 1 of plaintiff's complaint.
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9 2. With reference to paragraph 2 of plaintiff's complaint, admit that
10 defendant Othello Spanish Congregation of Jehovah's Witnesses, more
11 properly known as Othello North Spanish Congregation of Jehovah's
12 Witnesses located in Othello, Washington, is an unincorporated association
13 and a part of the worldwide religious organization known as Jehovah's
14 Witnesses, but deny any remaining allegations of paragraph 2 of plaintiff's
15 complaint.
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19 3. With reference to paragraph 3 of plaintiff's complaint, admit that
20 at one time, plaintiff and her parents were publishers and previously associated
21 with the Othello North Spanish Congregation of Jehovah's Witnesses, but
22 deny any remaining allegations of paragraph 3 of plaintiff's complaint.
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25 4. Deny paragraph 4 of plaintiff's complaint.
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1 5. With reference to paragraph 5 of plaintiff's complaint, admit that
2
3 the Governing Body exercises spiritual oversight of the organization of
4 Jehovah's Witnesses worldwide; admit that such Governing Body presently
5 consists of 11 men, who are part of what is known as the Faithful and Discreet
6 Slave described at Matthew 24:45-47; admit that all members of the
7 Governing Body are spirit-anointed Christians that have a heavenly hope;
8
9 admit that some of the members of the Governing Body served as members of
10 the Board of Directors and as officers of Watchtower Bible and Tract Society
11 of Pennsylvania, Inc., and of Watchtower Bible and Tract Society of New
12 York, until October, 2000; further admit that the Governing Body used
13 Watchtower Bible and Tract Society of Pennsylvania, to help carry out the
14 activities of Jehovah's Witnesses worldwide; admit that the Governing Body
15 exercises spiritual oversight over the organization of Jehovah's Witnesses
16 worldwide and oversees the appointment of congregation elders and
17 ministerial servants; admit that the Governing Body has six committees
18 (Chairman's, Writing, Teaching, Publishing, Personnel and Service); and
19 admit that the Governing Body oversees the promulgation of policies and
20 procedures for the spiritual, physical, and emotional welfare of all persons
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1 associating with Jehovah's Witnesses, as well as for all of mankind in general,
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3 but deny any remaining allegations of paragraph 5 of plaintiff's complaint.

4 6. With reference to paragraph 6 of plaintiff's complaint, admit that
5
6 the address for defendant Watchtower Bible and Tract Society of New York,
7
8 Inc., is 25 Columbia Heights, Brooklyn, New York 11201, and the Governing
9
10 Body does have ultimate spiritual authority to bar a publisher from serving in
11
12 certain positions of responsibility within the organization of Jehovah's
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14 Witnesses. Deny any remaining allegations of paragraph 6 of plaintiff's
15
16 complaint.

17 7. Admit paragraph 7 of plaintiff's complaint.

18 8. With reference to paragraph 8 of plaintiff's complaint, admit that
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20 the Governing Body exercises spiritual oversight over the organization of
21
22 Jehovah's Witnesses worldwide; admit that the Othello North Spanish
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24 Congregation of Jehovah's Witnesses has publishers, elders, ministerial
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26 servants, pioneers and others; admit that the Governing Body oversees the
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28 appointment of congregation elders, who are those individuals who have
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30 demonstrated by their speech and conduct that they meet the spiritual
requirements to serve as an elder, and further admit that elders serve as

1 spiritual shepherds and teachers for their local congregation. Defendants
2 further admit that the elders in a local congregation are referred to as the
3 “body of elders” and that the positions of congregation Presiding Overseer,
4 Secretary, Service Overseer, Watchtower Study Conductor, Theocratic School
5 Overseer and Book Study Overseer are held by elders. Further admit that
6 elders also investigate and respond to allegations of serious sins involving a
7 congregation publisher in accordance with the Holy Scriptures and the
8 procedures and policies established by the Governing Body of Jehovah’s
9 Witnesses. Further admit that ministerial servants are recommended by the
10 body of elders and appointed under the oversight of the Governing Body to
11 render a variety of practical services within the congregation, and further
12 allege that those individuals who are appointed as ministerial servants are men
13 who have demonstrated by their speech and conduct that they reasonably meet
14 the spiritual qualifications for such a position. Allegations of child molestation
15 made against congregation publishers are investigated by congregation elders.
16 Defendants admit that publishers who are appointed as ministerial servants are
17 individuals who have given evidence through their speech and conduct that
18 they reasonably meet the spiritual qualifications for such a position; admit that

1 a regular pioneer is a publisher who has demonstrated exemplary speech and
2 conduct, and whose personal circumstances allow the spending of 840 hours
3 per year in publicly preaching the good news of God's Kingdom. Defendants
4 deny any remaining allegations of paragraph 8 of plaintiff's complaint.
5
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7 9. With reference to paragraph 9 of plaintiff's complaint, defendants
8 admit that congregations of Jehovah's Witnesses are organized into circuits
9 which are composed of a number of congregations, and further allege that a
10 qualified elder serves as a circuit overseer to visit and provide spiritual
11 encouragement to each congregation in the circuit. Defendants admit that
12 substitute circuit overseers under the oversight of a Governing Body exist to
13 visit congregations if the circuit overseer is unavailable to do so; admit that
14 several circuits are organized into a district and that some of the congregations
15 within the district are visited by a district overseer who is appointed by the
16 Governing Body to provide spiritual encouragement to the congregations in
17 the district of assignment; admit that periodically arrangements are made by
18 the Governing Body to have qualified elders serve as zone overseers to visit
19 one or more of the branch offices of Jehovah's Witnesses worldwide; admit
20 that in each of the branch offices of Jehovah's Witnesses around the world,
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1 there is a branch committee that provides spiritual oversight over the activities
2 in the country or countries under their jurisdiction, and allege that Jehovah's
3 Witnesses assigned as volunteers at branch offices are commonly referred to
4 as "Bethelites," or members of the "Bethel" family; admit that there are three
5 Bethel complexes in the United States located in Brooklyn, Patterson and
6 Wallkill, New York; admit that the Executive Offices, Treasurer's Office, the
7 majority of the Writing Department, and the Governing Body of Jehovah's
8 Witnesses are located in Brooklyn, New York; admit that the United States
9 branch Service Department and most of the Legal Department are located in
10 Patterson, New York; admit that among the duties of the Service Department
11 are the spiritual oversight of the congregations, elders, circuit and district
12 overseers, and the preaching activity of Jehovah's Witnesses in the United
13 States; further admit that from time to time the Service Department issues
14 letters that provide spiritual assistance and guidance to congregations elders,
15 circuit and district overseers, and to congregations, but deny any remaining
16 allegations of paragraph 9 of plaintiff's complaint.

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25 10. With reference to paragraph 10 of plaintiff's complaint, admit
26 that the Governing Body of Jehovah's Witnesses provides spiritual oversight

1 over the activities of Jehovah's Witnesses worldwide and further admit that
2 the Governing Body oversees the appointment of spiritually qualified men to
3 provide spiritual oversight over branches, districts, circuits and congregations
4 of Jehovah's Witnesses throughout the earth, but deny the remaining
5 allegations of paragraph 10 of plaintiff's complaint.
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9 11. With reference to paragraph 11 of plaintiff's complaint, admit
10 that Jehovah's Witnesses teach that congregation elders, as well as members
11 of the Governing Body, are appointed by Holy Spirit to their office of spiritual
12 oversight; admit that Jehovah's Witnesses believe that wisdom and
13 understanding can be acquired from reading and studying the Bible; admit that
14 congregation elders serve as spiritual teachers for all persons associated with
15 their congregation, but deny the remaining allegations of paragraph 11 of
16 plaintiff's complaint.
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21 12. With reference to paragraph 12 of plaintiff's complaint, allege
22 that individual Jehovah's Witnesses exercise free choice as to whether or not
23 they want to follow direction, guidance and policies promulgated by the
24 organization, and further allege that many choose not to follow such direction.
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26
27 Further allege that no one is capable of, or expected to follow such to

1 perfection, and deny the specific allegations in paragraph 12 of plaintiff's
2 complaint.
3

4 13. With reference to paragraph 13 of plaintiff's complaint,
5 defendants allege that there is much more to an individual Jehovah's Witness
6 becoming a publisher than the ritual of baptism. Baptism is merely the final
7 step. Further allege that publishers do not donate personally or collect
8 donations because they are directed by the Governing Body or the local
9 congregation. Defendants further allege that a publisher's choice to do so is
10 on a voluntary basis based upon their own free will. Further allege that there
11 is no record kept of what individual publishers do in this regard, and that some
12 undoubtedly are incapable of donating and/or do not collect donations.
13 Defendants deny any remaining allegations of paragraph 13 of plaintiff's
14 complaint.
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16 14. With reference to paragraph 14 of plaintiff's complaint, allege
17 that some adult male publishers will never be eligible to be elders. Further
18 allege that the recommendation for someone to be an elder is made by the
19 entire local body of elders, and not by the Service Committee of the local
20 congregation; allege that the recommendation is sent to the United States
21

1 branch where it is then reviewed by appointed elders in the Service
2 Department. Further, defendants allege that publishers are not told that all
3 elders are exemplary, and allege that publishers know that elders are imperfect
4 humans who make mistakes, and further that some of them fall away from the
5 faith and are far from exemplary. Further allege that when it becomes known
6 that an elder is no longer conducting himself in an exemplary fashion, he is
7 removed. Defendants deny any remaining allegations of paragraph 14 of
8 plaintiff's complaint.
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13 15. With reference to paragraph 15 of plaintiff's complaint,
14 defendants allege that publishers are encouraged, but not expected, to teach
15 Bible truths to others, to include the good news of God's Kingdom, and deny
16 any remaining allegations of paragraph 15 of plaintiff's complaint.
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19 16. With reference to paragraph 16 of plaintiff's complaint, admit
20 that at various times in the past Manuel Beliz was associated with the Othello
21 North Spanish Congregation of Jehovah's Witnesses and that he was a
22 resident of the state of Washington during this association. Defendants further
23 admit that subsequently, upon information and belief, Manuel Beliz was
24 convicted of felony crimes involving sexual abuse of a minor and remains
25

1 incarcerated in the state of Washington. Further allege that Manuel Beliz was
2 disfellowshipped for a period of time, during which time Mr. Beliz would not
3 have been one of Jehovah's Witnesses. Defendants deny the remaining
4 allegations of paragraph 16 of plaintiff's complaint.
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6

7 **III.**

8 **VENUE**

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10 17. Admit that venue is proper in this Court pursuant to 28 U.S.C.
11 § 1391, but deny any remaining allegations of paragraph 17 of plaintiff's
12 complaint.
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14 **IV.**

15 **OPERATIVE FACTS**

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18 18. With reference to paragraph 18 of plaintiff's complaint, admit
19 that John White is an elder in the Othello North Spanish Congregation of
20 Jehovah's Witnesses, and further admit that congregation elders administer
21 spiritual counsel and discipline as needed to publishers associated with their
22 local congregation, but deny any remaining allegations of paragraph 18 of
23 plaintiff's complaint.
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1 19. Deny paragraph 19 of plaintiff's complaint for lack of present
2 information upon which to form a basis for belief.
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4 20. Deny paragraph 20 of plaintiff's complaint for lack of present
5 information upon which to form a basis for belief.
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7 21. With reference to paragraph 21 of plaintiff's complaint, admit
8 that, upon information and belief, plaintiff and her family moved to
9 Sacramento, California, and for a period of time were members of the Las
10 Palmas Congregation of Jehovah's Witnesses at that location, but deny any
11 remaining allegations of paragraph 21 of plaintiff's complaint.
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14 22. With reference to paragraph 22 of plaintiff's complaint, admit
15 that in June, 1996, plaintiff reported to Las Palmas Congregation elders Carlos
16 Chicas and Milton Melendez that she had been sexually abused by Manuel
17 Beliz, and deny any remaining allegations of paragraph 22 of plaintiff's
18 complaint.
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22 23. With reference to paragraph 23 of plaintiff's complaint,
23 defendants admit that subsequent to receipt of the information referenced in
24 paragraph 22 of plaintiff's complaint, elder Carlos Chicas contacted elder John
25 White of the Othello North Spanish Congregation, and advised John White
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1 that plaintiff had made allegations that Manuel Beliz had sexually abused her.
2 Defendants deny the remaining allegations of paragraph 23 of plaintiff's
3 complaint.
4

5 24. With reference to paragraph 24 of plaintiff's complaint, admit
6 that Manuel Beliz was disfellowshipped in 1996 and reinstated in 1998; admit
7 that plaintiff provided information to police authorities in Sacramento,
8 California, and Othello, Washington, which led to the subsequent arrest and
9 conviction of Manuel Beliz, but deny the remaining allegations of
10 paragraph 24 of plaintiff's complaint.
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13 25. With reference to paragraph 25 of plaintiff's complaint, admit
14 that Manuel Beliz was convicted of felony criminal sexual conduct with a
15 minor in the Adams County Superior Court in Ritzville, Washington, and
16 further admit that John White provided testimony to the court at the time of
17 sentencing of Mr. Beliz, but deny the remaining allegations of paragraph 25 of
18 plaintiff's complaint.
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21 26. With respect to paragraph 26 of plaintiff's complaint, defendants
22 deny that Washington had an applicable statute mandating any report by
23 church ministers, to include elders of the Othello North Spanish Congregation
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1 to report allegations of child abuse to law enforcement authorities, and
2 specifically deny any lawful duty to do so under circumstance of the
3 information related by plaintiff to church elders in Sacramento and/or as
4 subsequently related to elder John White of the Othello North Spanish
5 Congregation of Jehovah's Witnesses. Further allege that the applicable
6 Washington statute (RCW 26.44.030) imposes no such requirement or duty as
7 a matter of law. Defendants allege that the decision on reporting plaintiff's
8 allegations to law enforcement authority was left to the sole discretion of
9 plaintiff and/or her parents, and defendants deny any remaining allegations of
10 paragraph 26 of plaintiff's complaint.
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16 27. With reference to paragraph 27 of plaintiff's complaint,
17 defendants admit that Manuel Beliz was subsequently convicted on felony
18 charges based upon the information provided by the plaintiff to law
19 enforcement authorities, but deny the remaining allegations of paragraph 27
20 for lack of present information upon which to form a basis for belief.
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24 28. Deny paragraph 28 of plaintiff's complaint for lack of present
25 information upon which to form a basis for belief.
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1 29. With reference to paragraph 29 of plaintiff's complaint, these
2 defendants reallege their response to paragraph 26 of plaintiff's complaint, as
3 if more fully set forth herein; admit that John White is an elder with the
4 Othello North Spanish Congregation of Jehovah's Witnesses, and that Carlos
5 Chicas is an elder of the Las Palmas Congregation of Jehovah's Witnesses in
6 Sacramento, but deny any remaining allegations of paragraph 29 of plaintiff's
7 complaint.
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11 30. Deny paragraph 30 of plaintiff's complaint, and specifically
12 allege that defendants did not learn of any allegations of sexual abuse by
13 Manuel Beliz until after plaintiff first related such information in June, 1996,
14 to elders of the Las Palmas Congregation of Jehovah's Witnesses in
15 Sacramento, California.
16

17
18 31. Deny paragraph 31 of plaintiff's complaint.
19

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21 32. With respect to paragraph 32 of plaintiff's complaint, defendants
22 allege upon information and belief that elders John White and Carlos Chicas
23 acted appropriately upon receiving information from plaintiff, but deny all of
24 the remaining allegations of paragraph 32 of plaintiff's complaint.
25

26
27 33. Deny paragraph 33 of plaintiff's complaint.
28

1 34. Deny paragraph 34 of plaintiff's complaint.

2
3 35. Deny paragraph 35 and subparts (a) – (g) thereof of plaintiff's
4 complaint.

5 36. Deny paragraph 36 of plaintiff's complaint.

6
7 37. Deny paragraph 37 of plaintiff's complaint for lack of present
8 information upon which to form a basis for belief, and specifically deny that
9 plaintiff was unable to discover any injury caused by the sexually abusive
10 actions of Mr. Beliz as of the time of her disclosure of such information in
11 June, 1996.
12
13

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15 **V.**

16 **FIRST CAUSE OF ACTION:**

17 **NEGLIGENCE**

18
19 38. These defendants incorporate their answer to all paragraphs of
20 this complaint as necessary to respond to paragraph 38 of plaintiff's
21 complaint.
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24 39. Deny paragraph 39 of plaintiff's complaint.

25 40. Deny paragraph 40 of plaintiff's complaint.
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VI.

SECOND CAUSE OF ACTION:

BREACH OF FIDUCIARY DUTY

41. Defendants reallege their answer to all paragraphs of this complaint as necessary to respond to paragraph 41 of plaintiff's complaint.

42. Deny paragraph 42 of plaintiff's complaint.

43. With reference to paragraph 43 of plaintiff's complaint, defendants allege first knowledge of plaintiff's claims of sexual abuse by Manuel Beliz when such information was first provided in June, 1996; deny that any fiduciary duty was owed to plaintiff under the circumstances herein; deny that any duty was breached under the circumstances herein; and further deny any remaining allegations of paragraph 43 of plaintiff's complaint.

44. Deny paragraph 44 of plaintiff's complaint for lack of present information upon which to form a basis for belief, and specifically deny that plaintiff was unable to discover any injury caused by the alleged abusive acts of Manuel Beliz as of the date of the first disclosure to these defendants in June, 1996.

45. Deny paragraph 45 of plaintiff's complaint.

1 46. Deny paragraph 46 of plaintiff's complaint.

2 47. Deny paragraph 47 of plaintiff's complaint.

3 48. Deny paragraph 48 of plaintiff's complaint.

4
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6 **VII.**

7 **THIRD CAUSE OF ACTION:**

8 **CHILDHOOD SEXUAL ABUSE**

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10 49. Defendants reallege their answer to plaintiff's complaint as
11 necessary to respond to paragraph 49 of plaintiff's complaint.

12
13 50. Deny paragraph 50 of plaintiff's complaint for lack of present
14 information upon which to form a basis for belief.

15
16 51. Deny paragraph 51 of plaintiff's complaint for lack of present
17 information upon which to form a basis for belief.

18
19 **VIII.**

20 **CAUSATION AND DAMAGES**

21
22 52. Defendants reallege their answer to plaintiff's complaint as
23 necessary to respond to paragraph 52 of plaintiff's complaint.

24
25 53. Deny paragraph 53 of plaintiff's complaint.

26
27 54. Deny paragraph 54 of plaintiff's complaint.

1 55. Deny paragraph 55 of plaintiff's complaint.

2
3 **IX.**

4 **JURY DEMAND**

5 56. These defendants join plaintiff in a request for jury trial.

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8 FOR FURTHER ANSWER TO PLAINTIFF'S COMPLAINT AND AS
9
10 AFFIRMATIVE DEFENSES THERETO, defendants allege as follows:

11 1. Plaintiff's complaint fails to set forth a cause of action for which
12
13 relief can be granted as against these answering defendants.

14 2. Plaintiff's service of process on defendant Watchtower was
15
16 insufficient. Process server Angelo Rivera, of Avenger Process Services, Inc.,
17
18 stated in an Affidavit of Service that he left a copy of the plaintiff's complaint
19
20 with Watchtower employee Ms. Donna Bush; however, Watchtower does not
21
22 now and has not ever employed anyone by the name of Donna Bush.

23 3. The plaintiff's complaint is barred by operation of
24
25 RCW 4.16.340.

26 4. These answering defendants owed no legal duty, and no fiduciary
27
28 duty, to plaintiff under the circumstances herein such that her claims fail to

1 state a cause of action for which relief can be granted as against these
2 answering defendants.
3

4 5. Plaintiff's injuries and damages, if any, were due to the actions of
5
6 Manuel Beliz, for whom these answering defendants have no lawful liability.

7 6. Plaintiff's injuries and damages, if any, were caused by the
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9 intervening, superseding actions or omissions of third-parties for whom these
10 answering defendants have no lawful liability.

11 7. Plaintiff's injuries and damages, if any, resulted from her own
12
13 fault, carelessness and negligence, and were not caused by the negligence of
14
15 these answering defendants. If not the sole and proximate cause of plaintiff's
16 injuries and damages, plaintiff's fault, carelessness and negligence was a
17
18 contributing cause such that the amount of any damages must be reduced by
19 the percentage of fault, carelessness or negligence as found to exist at the time
20
21 of trial herein.

22 8. Plaintiff's claims are barred by the doctrine of laches.
23

24 9. Plaintiff's claims against these answering defendants must be
25
26 dismissed under provisions of the United States Constitution, First
27

1 Amendment, to specifically include the separation of church and state, and the
2 freedom of religion.
3

4 10. Contrary to the assertions in plaintiff's complaint,
5 RCW 26.44.030 does not require church ministers or clergy to report claims of
6 sexual abuse of a minor, and any claims premised upon such allegation fail to
7 state a claim for which relief can be granted herein.
8
9

10 11. Plaintiff has failed to mitigate her damages herein.
11
12

13 WHEREFORE, having fully answered plaintiff's complaint, and having
14 asserted affirmative defenses thereto, these answering defendants pray that
15 plaintiff's claim be dismissed with prejudice, and that these defendants be
16 awarded their costs and disbursements herein, to include reasonable attorney
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28 DEFENDANTS WATCHTOWER and
29 OTHELLO'S ANSWER TO PLAINTIFF'S
30 COMPLAINT - 22

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1 fees, and such other and further relief as the Court may deem just and
2 equitable under the circumstances herein.
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4

5 DATED this 5th day of August, 2002.
6

7 PAINE, HAMBLLEN, COFFIN,
8 BROOKE & MILLER LLP
9

10
11 By: 

12 Gregory J. Arpin, WSBA #2746
13 Donald G. Stone, WSBA #7547
14 Attorneys for Defendants
15 Watchtower and Othello North
16 Spanish Congregation
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CERTIFICATE OF SERVICE

I certify that on this 5th day of August, 2002, a true and correct copy of the foregoing DEFENDANTS WATCHTOWER AND OTHELLO SPANISH CONGREGATION'S ANSWER TO PLAINTIFF'S COMPLAINT and JOINDER IN DMAND FOR JURY TRIAL, was caused to be served as indicated below and addressed as follows:

Richard C. Eymann
EYMANN, ALLISON, FENNESSY,
HUNTER & JONES, P.S.
601 West Main Avenue, Suite 801
Spokane, WA 99201

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Attorneys for Plaintiff



GREGORY J. ARPIN
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DEFENDANTS WATCHTOWER and
OTHELLO'S ANSWER TO PLAINTIFF'S
COMPLAINT - 24

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